

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

| | | |
|----------------------|---|------------------|
| In re: |) | |
| |) | |
| EAGLE PROPERTIES AND |) | Bankruptcy Case |
| INVESTMENTS, LLC, |) | No. 23-10566-KHK |
| |) | Chapter 7 |
| Debtor. |) | |
| | |) |

**NOTICE OF CHAPTER 7 TRUSTEE'S MOTION TO APPROVE SALE OF
1635 CHURCH ROAD, HERSHEY, PA FREE AND CLEAR OF
LIS PENDENS AND NOTICE OF HEARING THEREON**

PLEASE TAKE NOTICE that H. Jason Gold, the Chapter 7 Trustee ("Trustee"), by counsel, has filed with the clerk of the United States Bankruptcy Court a motion for entry of an order approving the sale of the property commonly known as 1635 Church Road, Hersey, PA ("Motion").

UNDER LOCAL BANKRUPTCY RULE 9013-1, UNLESS A WRITTEN RESPONSE IN OPPOSITION TO THIS MOTION AND SUPPORTING MEMORANDUM ARE FILED WITH THE CLERK OF COURT AND SERVED ON THE MOVING PARTY WITHIN 21 DAYS OF THE SERVICE OF THIS NOTICE, THE COURT MAY DEEM ANY OPPOSITION WAIVED AND TREAT THE MOTION AS CONCEDED.

A HEARING TO CONSIDER THE RELIEF REQUESTED IN THIS MOTION IS SCHEDULED FOR JUNE 11, 2024 AT 11:00 A.M. IN COURTROOM III OF THE UNITED STATES BANKRUPTCY COURT, 200 SOUTH WASHINGTON STREET, ALEXANDRIA, VIRGINIA 22314.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief.

Respectfully submitted,

H. Jason Gold, TRUSTEE

By Counsel

NELSON MULLINS RILEY & SCARBOROUGH LLP
101 Constitution Avenue, NW, Suite 900
Washington, DC 20001
Telephone: (202) 689-2800
Facsimile: (202) 689-2860
Email: dylan.trache@nelsonmullins.com

By: /s/ Dylan G. Trache
Dylan G. Trache, Va. Bar No. 45939

Counsel to the Chapter7 Trustee

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of May, 2024, the foregoing Motion was served via U.S. mail upon the creditors and parties in interest on the attached service list.¹

/s/ Dylan G. Trache
Dylan G. Trache

¹ Pursuant to Local Rule 5005-1(C)(8), the attached service list is not being served on each of the parties, but is attached to the original Certificate of Service filed with the Court.